

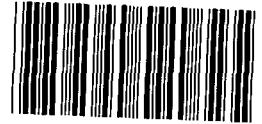


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MEMORANDUM

TO: Mike Zimmerman, OSC
EPA/ERB - Denver

FROM: Troy Sanders *T. Sanders*
TAT - Region VIII

Cordel Schmidt *C. Schmidt*
TAT - Region VIII

DATE: August 31, 1992

SUBJECT: Transmittal of Response to PRP Complaint Regarding Well
Installation Activities at the Richardson Flats Tailings Site;
TDD #T08-9207-019

*George Reisk, Esq.
E & E
(716) 684-8060*

This memorandum was written to satisfy the requirements of Technical Direction Document (TDD) #T08-9207-019 issued to the Ecology and Environment, Inc., Technical Assistance Team (E & E/TAT) by the Region VIII U.S. Environmental Protection Agency, Emergency Response Branch (EPA/ERB).

From June 23 through 27, 1992, the TAT provided oversight and technical assistance to the drilling subcontractor (Boyles Brothers Drilling Company) during the drilling, installation, and development of three groundwater monitoring wells at the Richardson Flats Tailings site near Park City, in Summit County, Utah. TAT was tasked by the EPA/ERB to perform these activities under TDD #T08-9204-015.

The monitoring wells construction details were based on information obtained during a review of literature describing the local geology and historic site information. All of the wells were installed according to commonly accepted geologic practices for the design, construction, and installation of groundwater monitoring wells in conjunction with EPA guidance and regulatory requirements, State of Utah Administrative Rules for Water Well Drillers, and E & E Geotechnical Practices Standard Operating Procedures (SOP).

On July 29, 1992, EPA/ERB received a letter from United Park City Mines Company (UPCM) (Attachment A) alleging that the monitoring wells were improperly constructed and completed and has resulted in the potential

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contamination of local groundwater. These allegations were based on a report prepared by their consultant (Pioneer Technical Services, Inc. [PTS]) describing comments and observations on the related drilling activities.

Enclosed is the TAT rebuttal to the Pioneer Technical Services, Inc., July 13, 1992, report describing comments and observations which is included as Attachment B of this memorandum.